

James S. Yu (JY-9734)
SEYFARTH SHAW LLP
620 Eighth Avenue
New York, New York 10018-1405
(212) 218-5500

J. Scott Humphrey (admitted *pro hac vice*)
Robyn E. Marsh (admitted *pro hac vice*)
SEYFARTH SHAW LLP
233 South Wacker Drive
Suite 8000
Chicago, Illinois 60606
Tel.: (312) 460-5000

Attorneys for Plaintiff/Counter-Defendant Allstate Life Insurance Company

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ALLSTATE LIFE INSURANCE COMPANY,

• Plaintiff,

• v.

JEFFREY STILLWELL,
THERESA FRANCY, and STILLWELL
FINANCIAL ADVISORS, LLC,

• Defendants.

JEFFREY STILLWELL,

• Counter-Plaintiff,

• v.

ALLSTATE LIFE INSURANCE COMPANY,

• Counter-Defendant.

Civil Action No.:

3:15-cv-08251-AET-TJB

**ALLSTATE LIFE INSURANCE
COMPANY'S MOTION FOR
LEAVE TO FILE EXHIBIT UNDER
SEAL IN SUPPORT OF PETITION
FOR FEES**

Plaintiff Allstate Life Insurance Company ("ALIC"), pursuant to Local Rule 5.3(c) and the Protective Order (Dkt. 17) entered in this action, moves this Honorable Court to file Exhibit 1

to the Declaration of J. Scott Humphrey in support of its ALIC's Petition for Attorneys' Fees, under seal. In support thereof, ALIC states as follows:

This action involves claims against Defendants Jeffrey Stillwell and Theresa Francy, and Stillwell's newly formed company Stillwell Financial Associates, LLC ("SFA") for breach of contract, misappropriation of trade secrets, tortious interference, and unfair competition. On or around March 10, 2021, this Court entered an order regarding the parties' agreed dismissal as to certain claims, as well as a briefing schedule with respect to ALIC's Motions for Fees and Costs pursuant to Federal and Local Rule 54. (ECF 144.) In support of its Motion for Fees, ALIC is attaching the Declaration of J. Scott Humphrey, which attaches the detailed attorney bills and related fees. These bills are highly confidential and, notwithstanding ALIC's petition for fees, are intended only to be shared between Seyfarth Shaw LLP and its client ALIC. In other words, the attorney billing records are not intended for public review. In addition, while portions of the bills for which ALIC does not seek reimbursement of fees have been redacted, the bills still include detailed description of attorney time and associated rates. ALIC has not previously requested any order from this Court requesting that these documents be filed under seal. ALIC is not aware of any party objecting to the motion to seal request.

WHEREFORE, Allstate Life Insurance Company respectfully requests this Court grant its motion to seal Exhibit 1 attached to the Declaration of J. Scott Humphrey in support of ALIC's Petition for Attorneys' Fees.

Dated: April 22, 2021

Respectfully submitted,

SEYFARTH SHAW LLP

By: /s/ James S. Yu

James S. Yu
620 Eighth Avenue, 32nd Floor
New York, NY 10018
Tel.: (212) 218-5500

J. Scott Humphrey (admitted *pro hac vice*)
Robyn E. Marsh (admitted *pro hac vice*)
233 South Wacker Drive, Suite 8000
Chicago, Illinois 60606
Tel.: (312) 460-5000

*Attorneys for Plaintiff/Counter-Defendant Allstate
Life Insurance Company*

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that on April 22, 2021, he electronically filed the foregoing **Motion for Leave to File Exhibit Under Seal** with the Clerk of the Court using the ECF system, which will send notification to all counsel of record.

/s/ James S. Yu

James S. Yu